

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: PORTERFIELD-SCHEID : Chapter 11  
MANAGEMENT COMPANY, LLC, :  
Debtor : Case No. 1:24-bk-01127

**LIMITED OBJECTION OF RFM JLM, LLC  
(HEREINAFTER REFERRED TO AS "RFM") MOTION TO INCUR DEBT**

RFM JLM, LLC (RFM") by and through By and through its counsel, Saxton & Stump hereby files this Limited Objection to the Debtor's Motion to Incur Debt and defers as follows:

1. Debtor filed a voluntary Chapter 11 Petition on May 3, 2024.
2. Debtor owns real estate located at 3223 - 3225 Main Street, Conestoga, Pennsylvania 17510 ("Main Street").
3. At the time of the filing, Main Street was encumbered by mortgages in favor of Community First Fund.
4. Subsequent to the filing, the debt and mortgages of a Community First Fund were assigned to RFM.

5. RFM objects to the Motion of Debtor unless:
  - (a) It is to be paid in full;
  - (b) In a timely manner but no later than 12/31/24;
  - (c) It consents to relief from stay if not paid by 12/31/24.

WHEREFORE, RFM respectfully requests the entry of an Order to incur debt subject to the above conditions.

Respectfully submitted,

SAXTON & STUMP, LLC

Date: November 25, 2024

By: /s/ Barry A. Solodky

Barry A. Solodky, Esquire  
Attorney I.D. No. 19259  
280 Granite Run Drive, Suite 300  
Lancaster, PA 17601  
Phone: (717) 556-1000  
Fax: (717) 441-3810  
bso@saxtonstump.com

*Attorneys for RFM JLM, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: PORTERFIELD-SCHEID : Chapter 11  
MANAGEMENT COMPANY, LLC, :  
Debtor : Case No. 1:24-bk-01127

**CERTIFICATE OF SERVICE**

I, Barry A. Solodky, Esquire hereby certify that I caused a true and correct copy of the foregoing LIMITED OBJECTION OF RFM JLM, LLC (hereinafter referred to as "RFM"), to be served via United States Mail, postage prepaid and electronic mail, upon the following counsel of record:

Lawrence V. Young, Esquire  
135 North George Street  
York, PA 17401

Lisa Rynard, Trustee  
Email: [Larynard@larynardlaw.com](mailto:Larynard@larynardlaw.com)

Daniel Seidman  
Ciardi & Astin  
1905 Spruce Street  
Philadelphia, PA 19103  
Email: [dseidman@ciardilaw.com](mailto:dseidman@ciardilaw.com)

Suzanne P. Conaboy  
Email: [Suzanne.scanlon@ustoj.gov](mailto:Suzanne.scanlon@ustoj.gov)

Joseph P. Schalk, Esq.  
Email: [joseph.schalk@usdoj.gov](mailto:joseph.schalk@usdoj.gov).

Date: November 25, 2024

/s/ Barry A. Solodky  
Barry A. Solodky, Esquire